

EXHIBIT A

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

SANDRA IMPROTA,

Plaintiff,

-against-

MORRISON MANAGEMENT SPECIALISTS, INC.,
COMPASS GROUP USA, INC., NORTHWELL
HEALTH, INC. AND STATEN ISLAND UNIVERSITY
HOSPITAL NORTH,

Defendants.

Case No.:

**DECLARATION OF
SARA-JADE PRAGASAM**

I, Sara-Jade Pragasam, of full age, hereby certify and declare as follows:

1. I am an attorney in good standing duly admitted to practice law before the bar of the State of New York. I am currently employed as Associate Corporate Counsel for Defendant Compass Group USA, Inc. ("Compass"). I make this declaration voluntarily. The statements contained in this declaration are based on my personal knowledge or, where indicated, my review of the books and records of Compass and its subsidiaries, which are maintained in the regular course of business of these entities, as explained herein.

2. In my capacity as counsel for Compass, I am familiar with Compass' corporate structure and status, including the location of its operations.

3. Compass is a Delaware Corporation with its principal place of business in North Carolina. Compass is also the parent corporation of Defendant Morrison Management Specialists, Inc. ("Morrison").

4. Morrison is a wholly owned subsidiary of Compass. Morrison is a Georgia Corporation with its principal place of business in Georgia.

5. Morrison provides food services at a café and other locations maintained on the

property of Staten Island University Hospital. Morrison has an independent contractor relationship with SIUH to provide these services.


6. Pursuant to that relationship, Morrison and Compass retained sole authority to hire, fire, supervise, and pay its managerial personnel, including Plaintiff.

7. I have reviewed the personnel and payroll records of Morrison and Compass and can confirm that Plaintiff Sandra Improta was employed as an office manager by Morrison during the period September 2013 to January 2019 and that Morrison and Compass were legally obligated to – and did – pay Plaintiff's compensation, i.e. wages, during that period. According to the payroll records, for 2018, as reported on her Form W-2, Plaintiff was paid total compensation of \$49,932.48.

8. I have authority to act on behalf of Compass and Morrison, and each consents to the removal of this action.

Pursuant to Pursuant to 28 U.S.C. § 1746, I certify under penalty of perjury under the laws of the United States of America that the foregoing statements made by me are true and correct. I am aware that if any of the foregoing statements made by me are willingly false, I am subject to punishment.

Date: November 12, 2019
Charlotte, North Carolina


Sara-Jade Pragasam